

The Honorable Richard A. Jones

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

BOMBARDIER, INC.,

Plaintiff,

v.

MITSUBISHI AIRCRAFT CORPORATION,
MITSUBISHI AIRCRAFT CORPORATION
AMERICA, INC.; AEROSPACE TESTING
ENGINEERING & CERTIFICATION, INC.;
MICHEL KORWIN-SZYMANOWSKI;
LAURUS BASSON; MARC-ANTOINE
DELARCHE; CINDY DORNÉVAL; KEITH
AYRE; and JOHN AND/OR JANE DOES 1-88.)

Defendants.

NO. 2:18-cv-1543 RAJ

DECLARATION OF RICHARD
READE IN SUPPORT OF THE
AEROTEC DEFENDANTS
OPPOSITION TO MOTION FOR
PRELIMINARY INJUNCTION

I, Richard Reade, declare as follows:

1. I am the Lead of the Technology & Digital Innovation department of defendant Aerospace Testing Engineering & Consulting, Inc. ("AeroTEC"). I make this declaration based on personal knowledge and information, a review of AeroTEC's business records, and information provided to me by AeroTEC employees and representatives. I am over the age of 18 and otherwise competent to testify to the matters stated herein.

1 2. AeroTEC assigns a company-owned laptop and/or desktop computer to its
2 employees. AeroTEC employees typically are not issued a company mobile phone, but it offers
3 employees reimbursement for phone charges.

4 3. AeroTEC creates and maintains a record for each AeroTEC device that is assigned
5 to an employee, and these records contain the normal identifiers including model number, part
6 number, serial number, host name, and AeroTEC identifiers assigned to each device, along with
7 the associated employee's name.

8 4. I have reviewed AeroTEC's records and confirmed the following:

9 a. AeroTEC employee Michel Korwin-Szymanowski been assigned a total of one
10 AeroTEC laptop since he started work on March 11, 2015. The laptop is identified
11 as: Microsoft Surface Pro 3_SURFACE001. He was never assigned an AeroTEC
12 desktop computer.

13 b. AeroTEC employee Laurus Basson been assigned a total of one AeroTEC laptop
14 since he started work on March 14, 2016. The laptop is identified as:
15 Laptop_SKYHOPPER339. He was also assigned a total of one AeroTEC desktop
16 identified as Desktop_PRECISION106.

17 c. Former AeroTEC employee Marc-Antoine Delarche was assigned a total of one
18 AeroTEC laptop from the date he started work on July 11, 2016, to his last day on
19 August 10, 2018. The laptop is identified as: Laptop_SKYHOPPER125. He was
20 also assigned a total of one AeroTEC desktop identified as
21 Desktop_PRECISION153. AeroTEC retained possession of these computers after
22 Mr. Delarche terminated his employment.

23 d. AeroTEC employee Cindy Dornéval has been assigned a total of two AeroTEC
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laptops since she started work on February 20, 2017. The laptops are identified as: Laptop_SKYHOPPER335 and Laptop_SKYHOPPER196. She was never assigned an AeroTEC desktop computer.

The foregoing AeroTEC laptops and desktop computers were all provided to Fronteo for forensic imaging.

5. None of the above employees were ever assigned an AeroTEC phone or other device.

6. AeroTEC maintains and operates a total of four network-based file share servers. The host names for these servers are: Roadedge2, Fileedge, Fileedge3, and Commonshare. Fileedge is a legacy server, and the files on that server that are accessible to employees are also contained on the FileEdge3 production server. Commonshare is a server that contains data of both AeroTEC and MITAC America. RoadEdge2 is a server that contains the files of offloaded AeroTEC employees.

7. The above servers contain approximately 44 terabytes of data. AeroTEC has diligently tried to get as much data to Fronteo as possible so they could process the data and run searches for the documents at issue in this litigation. Given the amount of data and timing restraints, we have to date delivered all .doc, .docx, .pptx, and .pdf files¹ from the FileEdge3 and Commonshare servers, as well as the legacy files from RoadEdge2 that were related to former employee Marc-Antoine Delarche, to Fronteo USA, Inc. ("Fronteo").

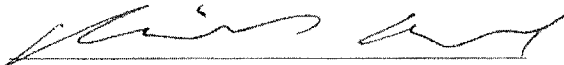
8. Processing the data is an immense and time-consuming process, and AeroTEC is continuing to transfer data to Fronteo from other AeroTEC servers, backups and devices.

I declare under penalty of perjury of the laws of the United States that the foregoing is true

¹ I was advised that these were the file types attached to the emails at issue in Bombardier's Preliminary Injunction Motion.

1 and accurate.

2 Executed this 26th day of December, 2018, at Seattle, Washington.

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Richard Reade